

Exhibit 2

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September 17, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re: General Motors LLC Ignition Switch Litigation,*
14-MD-2543 (JMF)

Dear Judge Furman:

Counsel for General Motors LLC (“New GM”) write regarding the issue of settlement as it relates to (i) the Department of Justice’s investigation of New GM involving the ignition switch; and (ii) the pending putative securities class action against New GM (*New York State Teachers’ Retirement System v. General Motors LLC, et al.*, No.14-cv-11191 (E.D. Michigan, Judge Linda Parker)). While neither matter is pending before the Court, given that both matters may implicate the Court’s management of this MDL, we are writing to inform the Court concerning resolution of these matters.

First, it is being announced today that New GM and the Department of Justice, SDNY, have reached an agreement regarding the Department’s investigation of New GM with respect to the ignition switch matter. New GM has entered into a Deferred Prosecution Agreement, and related papers, with the Department. One of the documents that New GM has agreed to as part of its agreement is a Statement of Facts. It is our understanding that these documents are being made publicly available by the Department of Justice today and we will provide you a courtesy copy as soon as practicable.

Second, with respect to the putative securities class action, we are very pleased to inform the Court that New GM and lead plaintiffs’ counsel have reached an agreement that will resolve that case, subject to execution of a final settlement agreement, notice to the class, and approval by Judge Parker. But with that settlement, any potential conflict with or the possible need for discovery duplicative of what already has taken place in this MDL should be avoided. At upcoming Status Conferences, we will keep the Court advised regarding the settlement approval process in the *New York State Teachers’ Retirement System* case.

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We will be prepared at the next Status Conference to answer any questions that the Court may have regarding either of the matters discussed above.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: The Honorable Robert E. Gerber
MDL Counsel of Record
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